

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

GEORGE IVERSON,

Plaintiff,

V.

BRAINTREE PROPERTY
ASSOCIATES, L.P.,

Defendant.

C. A. NO. 04-cv-12079-NG

DEFENDANT'S ASSENTED TO MOTION FOR EXTENSION OF
TIME TO RESPOND TO PLAINTIFF'S MOTION FOR ATTORNEY'S FEES

Defendant Braintree Property Associates, L.P., (“Braintree” or “Defendant”) hereby moves this Court for an extension of time up to and including December 3, 2007 for Defendant to file its Opposition to Plaintiff’s Motion for Attorney’s Fees, Costs, Expert Fees and Litigation Expenses. In support of this motion, Braintree states as follows:

1. On September 18, 2006, the respective parties filed a Settlement Agreement under seal.
2. By Order dated October 2, 2007, this Court Ordered Plaintiff's counsel to submit an application for attorney's fees by October 11, 2007.
3. On October 8, 2007, Plaintiff filed an Agreed Motion for Extension of Time to Move for Attorney's Fees.
4. On October 9, 2007, this Court granted Plaintiff's Motion for Extension of Time to Move for Attorney's Fees.

5. On October 22, 2007, Plaintiff filed its Verified Application for Attorneys' Fees, Costs and Expert's Fees and Accompanying Memorandum of Law. On October 23, 2007 plaintiff filed its Amended Motion to Its Verified Application for Attorneys' Fees, Costs and Expert's Fees.

6. Defendant's response to Plaintiff's Motion for Attorney's Fees is currently due November 19, 2007.

7. Defendant needs additional time to analyze and respond to plaintiff's motion for attorney's fees. In addition, the respective parties continue to negotiate with respect to the issue of attorney's fees. Accordingly, Defendant respectfully requests a two week extension in which to respond to plaintiff's motion for attorney's fees.

8. Plaintiff has assented to the request sought herein.

WHEREFORE, Defendant respectfully requests that this Court enter an Order extending the time within which it must respond to plaintiff's motion for attorney's fees up to and including December 3, 2007.

Respectfully submitted,

GEORGE IVERSON
ASSOCIATES

By his attorney,

/s/ John P. Fuller
John P. Fuller (pro hac vice)
#644796)
Fuller, Fuller and Associates, P.A.
12000 Biscayne Boulevard, Suite 609
North Miami, Florida 33181
(305) 891-5199

BRAINTREE PROPERTY

By its attorneys,

/s/ Jennifer Martin Foster
Jennifer Martin Foster (BBO
Greenberg Traurig LLP
One International Place
Boston, MA 02110
(617) 310-6000

Dated: November 19, 2007

CERTIFICATION PURSUANT TO LOCAL RULE 7.1

Defendant, Braintree Property Associates, L.P. by and through counsel, hereby certify that they conferred with opposing counsel in a good faith attempt to resolve or narrow the issues raised herein and that counsel for plaintiff has assented to this motion.

/s/ Jennifer Martin Foster
Jennifer Martin Foster

CERTIFICATE OF SERVICE

I, Jennifer Martin Foster, hereby state that on November 19, 2007, I caused to be served a copy of the foregoing via the Court's CM/ECF System upon counsel for George Iverson, John P. Fuller, Esq., Fuller, Fuller & Associates, P.A., 12000 Biscayne Boulevard, Suite 609, North Miami, Florida 33181.

/s/ Jennifer Martin Foster
Jennifer Martin Foster